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VIA FACSIMILE AND FEDERAL EXPRESS

April 30, 2007

Ms. Joan Martin Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Chem Fab Corporation Site, Doylestown, Bucks County, Pennsylvania

Dear Ms. Banks:

The following is Ashland Inc.'s ("Ashland") response to the U.S. Environmental Protection Agency's ("EPA") 104(e) Request for Information in connection with the above-referenced site. Ashland has made every effort to provide accurate and truthful responses to your questions, and Ashland is aware that any subsequent information responsive to the Request which may become available after submission of this document must be provided.

Questions

1. What is the current nature of your business or activity? What was the nature of your business or activity during the period 1965 to 1999? Please describe in detail if the nature of your business or activity changed from the period 1965 to 1999. Please provide a detailed explanation of these changes.

Response: Ashland Inc. is a chemical company operating through four wholly owned divisions providing chemical related products, services and solutions. The Ashland Chemical Company Division during the period 1965 to 1999 was primarily engaged in the business of manufacture and/or wholesale distribution of chemicals.

In an effort to respond to this request, Ashland will focus on its previously owned facilities in Great Meadows, New Jersey, and Easton, Pennsylvania, which are identified in Question No. 2.

From 1966 until 1978, Ashland operated a facility referred to as the Great Meadows Facility ("Great Meadows"), located at Alphono Road, Great Meadows, New Jersey 07838. In 1978, Ashland sold Great Meadows to The Southland Corporation. During Ashland's ownership, Great Meadows was engaged in the manufacture and batch processing of various specialty organic chemicals used in the manufacture of pharmaceuticals, and custom chemicals consisting of non-proprietary products produced for others.

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From 1975 to 2003, Ashland operated a facility referred to as the Easton, Pennsylvania Facility ("Easton"), located at 400 Island Park Road, Easton, Pennsylvania 18042. In 2003, Ashland sold its entire Electronic Chemicals Division, of which Easton was a part, to Air Products & Chemicals Inc. During Ashland's ownership, Easton manufactured ultra-high-purity chemicals for use in the semiconductor manufacturing industry.

2. EPA has obtained information during the course of its investigation indicating that your facilities in Easton, Pennsylvania, and Great Meadows, New Jersey, may have produced waste, which was disposed of at the Site, and/or disposed of waste at the Site referenced in this letter. Please provide the following information regarding wastes and by-products produced by you during the period 1965 to 1999:

- a. The nature of each "waste" (as the term "waste" is defined in paragraph 6 of the definitions attached hereto) used including its chemical content, characteristics and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers, scrap metal). Provide chemical analyses and Material Safety Data Sheets ("MSDS"). If these analyses are not available for the period 1965 through 1999, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which these wastes were produced that would affect the chemical analyses;
- b. The annual quantity of each "waste" used or generated:
- c. The process(es) in which each "waste" was used or the process(es) that generated each:
- d. The types of containers used to treat, store or dispose of each "waste"; and
- e. The method of treatment and/or disposal of each "waste".

Response: Ashland objects to Question No. 2 as being overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving and subject to the foregoing objections, Ashland states that it has not located any information or documents which indicate that it transported or disposed of any "waste" to the Site.

3. Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons, including your own, who during the period 1965 to 1999, who may have:
 - a. Disposed of or treated "waste" at the Site;
 - b. Arranged for the disposal or treatment of "waste" at the Site; or
 - c. Arranged for the transportation of "waste" to the Site (either directly or through transshipment points) for disposal or treatment.

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Response: Ashland objects to Question No. 3 as being overly broad and unduly burdensome. Without waiving and subject to the foregoing objections, Ashland states that it has not located any information or documents which indicate that it transported or disposed of any "waste" to the Site. Further, Ashland refers EPA to publicly available information such as annual hazardous waste reports for the Site to identify persons who disposed of or treated "waste" at the Site.

4. Describe the methods used by you to dispose of and/or treat "waste" during the period 1965 to 1999.

Response: Ashland objects to Question No. 4 as being overly broad, vague, and not calculated to elicit relevant information. Without waiving and subject to the foregoing objections, Ashland states that it is and was a large and diverse corporation comprised of many facilities throughout the United States during the period 1965 to 1999. However, in a good faith effort to provide a response to Question No. 4, Ashland will focus on its previously owned facilities in Great Meadows, New Jersey, and Easton, Pennsylvania, which are identified in Question No. 2.

The facility in Great Meadows, New Jersey is currently subject of a pending contribution action brought by the Boarhead Farm Agreement Group, No. 02-3830. Ashland refers EPA to information previously provided by Ashland or available to EPA in this matter involving methods used by it to dispose of and/or treat "waste" during the period 1965 to 1999. Ashland also refers EPA to the transcripts of the deposition of Arthur Curley taken in (1) the United States District Court for the District of New Jersey in the *Southland Corporation v. Ashland Oil, Inc. et al*, No. 88-700, and (2) in the United States District Court for the Eastern District of Pennsylvania in *Agere Systems Inc., et al. v. Advanced Environmental Technology Corp., et al.*, No. 02-CV-3830 (LDD) which describe the practices of disposal of substances at the Great Meadows facility.

Beginning in 1993 until Ashland sold the facility in 2003, Ashland Distribution Environmental Services handled drummed waste from Easton. Any waste from Easton would have been transported to Ashland's RCRA Part B permitted storage facility located in Binghamton, New York. Drums of similar wastes from various generators were then aggregated into full tractor trailer truckloads and transported to either Waste Treatment Industries (WTI) for incineration or Pollution Control Industries (PCI) for treatment/reclamation.

Ashland has limited information regarding Easton's waste disposal practices prior to 1993. However, Ashland believes that Easton transported its "waste" primarily to Marilsol, Inc. in Middlesex, New Jersey, and Chemical Waste Management of Newark, New Jersey, between 1975 and 1993.

5. If your response to Question 4 includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain the arrangements for those transactions and provide documentation that confirms the nature of those transactions.

Response: Ashland refers EPA to its objections and responses to Question No. 4.

6. Did you make arrangements with any of the following companies or individuals to transport and/or dispose of wastes? Manfred De Rewal, Echo Corporation, Revere Chemical Company, Revere Chemical Transport, De Rewal Chemical Company, Inc., Boarhead Corporation, East Falls Corporation, Advanced Environmental Chemical Control, Inc., Jonas Waste Removal, Marvin Jonas, Inc., Marvin Jonas, Simon Wrecking, Simon Resources Inc., Sam Simon, Chem Fab Corporation, Hans Richard Becker, Gulbrandsen Co., Chemical Leaman Tank Lines Inc., Coastal Tank Lines Inc., Macs Associates, and Matlack Transportation Co.

If so, identify:

- a. The persons with whom you, or such other persons, made such arrangements;
- b. Every date on which arrangements took place;
- c. For each transaction, the nature and quantify of the "waste: including the chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
- d. Precise locations at which each "waste" was disposed or treated;
- e. The persons who selected the Site as the place at which "waste" was disposed or treated;
- f. The final disposition of each of the "wastes" involved in such transactions; and
- g. The names of employees, officers, owners and agents for each transporter:

Response: Ashland objects to Question No. 6 as being overly broad, vague, and not reasonably calculated to elicit relevant information. Without waiving and subject to the foregoing objections, Ashland states that it currently and formerly has operated facilities at hundreds of locations throughout the United States since it was founded in 1924. Accordingly, in order for Ashland to conduct a search of its microfiche and microfilm records more specificity is needed with respect to date, location(s), and types of transactions. For further answer, Ashland states that records indicate that any Ashland waste shipped by DeRewal was shipped only to DeRewal's own facility located in the Wissinoming Section of Philadelphia, Pennsylvania during a limited time period in late 1976 and/or early 1977. Ashland further states that it has not located any information or documents which indicate that it transported or disposed of any "waste" to Chem Fab.

7. For each and every instance in which you arranged for disposal or treatment of "waste" at the Site, identify:
- The characteristics, physical state (i.e., liquid, solid) and chemical composition of each "waste";
 - The persons who supplied you with "waste" material disposed or otherwise handled by you;
 - How such "wastes" were used, treated, transported, disposed or otherwise handled by you;
 - When and where such "wastes" were used, treated, transported, disposed or otherwise handled by you;
 - The quantity (number of loads, gallons, drums) of the "wastes" which were used, treated, transported, disposed or otherwise handled by you;
 - Any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with you to generate, treat, store, transport or dispose of "wastes" at the Site.

Response: Ashland has not located any information or documents which indicate that it transported or disposed of any "waste" to the Site.

8. Provide the names, titles and areas of responsibility of any persons, including all present and former employees, who may be knowledgeable of your waste disposal practices, whether or not involving disposal at the Site, during the period 1965 to 1999. Include current addresses and dates of birth for former employees.

Response: Ashland objects to Question No. 8 as being overly broad, vague, and not calculated to elicit relevant information. Without waiving and subject to the foregoing objections, Ashland states that it has operated facilities at hundreds of locations throughout the United States during the period 1965 to 1999. However, in a good faith effort to provide a response to this Request, Ashland will focus on and provide information regarding its previously owned facilities in Great Meadows, New Jersey, and Easton, Pennsylvania, which are identified in Question No. 2.

Former Ashland employee Arthur T. Curley may have knowledge regarding any waste disposal practices at Ashland's former facility in Great Meadows, New Jersey. Mr. Curley was employed in the capacity of facilities manager at the facility during Ashland's ownership. His last known address is 17 Far View Road, Great Meadows, New Jersey.

Additionally, the facility in Great Meadows, New Jersey, is currently subject of a pending contribution action brought by the Boarhead Farm Agreement Group, No. 02-3830. Ashland refers EPA to information previously provided by Ashland or available to EPA in this matter

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involving persons who may have knowledge of the waste disposal practices at the facility in Great Meadows, New Jersey

Current Ashland employee Ed Graves may have knowledge regarding waste disposal practices at Ashland's former facility in Easton, Pennsylvania, for the period 1993 to 2003. Mr. Graves may be contacted through the undersigned.

9. Describe any permits or applications and any correspondence between you and any regulatory agencies regarding "wastes" transported to or disposed of at the Site.

Response: Ashland has not located any information or documents which indicate that it transported or disposed of any "waste" to the Site.

10. Provide copies of any correspondence between you and any third party regarding "waste" transported to or disposed of at the Site.

Response: Ashland has not located any information or documents which indicate that it transported or disposed of any "waste" to the Site.

11. Provide the identity of, and copies of any documents relating to, or any other persons who generated, treated, stored, transported or disposed, or who arranged for the treatment, storage, disposal or transportation of such "wastes" to the Site.

Response: Ashland objects to Question No. 11 as being overly broad and unduly burdensome. Without waiving and subject to the foregoing objections, Ashland states that it has not located any information or documents which indicate that it transported or disposed of any "waste" to the Site. Further, Ashland refers EPA to publicly available information such as annual hazardous waste reports for the Site that would identify persons who generated, treated, stored, transported or disposed, or who arranged for treatment, storage, disposal or transportation of "waste" to the Site.

12. Provide the identities of all predecessors in interest who, during the period 1965 to 1999, transported, stored, treated or otherwise disposed of any "waste" at the Site and describe in detail the nature of your predecessor in interest's business. Describe all changes in ownership from 1965 to the present, including the date of ownership change and identify the type of change (i.e., asset purchase, corporate merger, consolidation, and name change). Provide a copy of each asset purchase and merger agreement.

Response: Ashland states that it has not located any information or documents which indicate that it transported or disposed of any "waste" to the Site.

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13. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.

Response: David M. Abner
Senior Litigation Counsel
Ashland Inc.
5200 Blazer Parkway
Dublin, Ohio 43017
614.790.1556

Mary A. Donahue
Paralegal
Ashland Inc.
5200 Blazer Parkway
Dublin, Ohio 43017
614.790.3319

14. For each question, provide the name, title area of responsibility, current address and telephone number of all persons consulted in the preparation of the answers.

Response: Ashland's in-house counsel, outside counsel, and current employees participated in the preparation of Ashland's responses to this Information Request.

15. If you have reason to believe that there may be persons able to provide more detailed or complete responses to any question contained herein or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons and describe the additional information or documents that may have.

Response: Ashland has no information about other parties who would be able to provide more detailed or complete responses to any questions contained herein or who may be able to provide additional responsive documents.

16. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas of responsibility, current addresses and telephone numbers of the persons from whom such information or documents may be obtained.

Response: Ashland refers EPA to publicly available information or documents and information or documents already in its possession.

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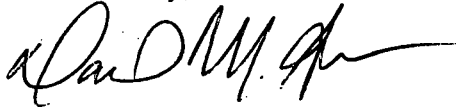
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17. If you have any information about other parties who may have information which may assist the Agency in its investigation of the Site or who may be responsible for the generation of, transportation to or release of contamination at the Site, please provide such information. The information you provide in response to this request should include each party's name, address, type of business and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response: Ashland refers EPA to publicly available information or documents and information or documents already in its possession

In replying to this Request, Ashland has not, and shall not be deemed to have admitted any liability or responsibility with respect to the Site, the subject matter of this Information Request, or any other matter. If, following your review, EPA has questions concerning any responses herein, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "David M. Abner", with a stylized flourish at the end.

David M. Abner